

EXHIBIT 19

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VOLUME I
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COMMONWEALTH OF MASSACHUSETTS
Middlesex, ss. Superior Court Department
of the Trial Court
No. 00-6030

CAROL A. STARKWEATHER, *
Plaintiff, *
*
vs. *
*
ACandS, INC., et al, *
Defendants. *

DEPOSITION OF DR. WILLIAM E. LONGO, a
witness called on behalf of the Defendants, taken
pursuant to the applicable provisions of the

1 APPEARANCES:
2
3 Representing the Plaintiff:
4 LAW OFFICE OF MICHAEL C. SHEPARD, P.C.
5 205 Portland Street
6 Boston, MA 02114
7 BY: MICHAEL C. SHEPARD, ESQ.
8 (617) 742-1121 (617) 742-5155 (Fax)
9
10 Representing ACandS, Inc., A.P. Green, Inc.,
11 Certainteed, Georgia-Pacific, Pfizer, Quigley,
12 Riley Stoker Corporation, and Union Carbide:
13 CETRULO & CAPONE
14 2 Seaport Lane
15 10th Floor
16 Boston, MA 02210
17 BY: JENNIFER A. CREEDON, ESQ.
18 (617) 217-5500 (617) 217-5200 (Fax)
19
20 Representing New England Insulation:
21 CETRULO & CAPONE
22 2 Seaport Lane
23 10th Floor
24 Boston, MA 02210
BY: KATHARINE S. PERRY, ESQ.
(617) 217-5500 (617) 217-5200 (Fax)
Representing Amchem Products, Inc.:
CETRULO & CAPONE
2 Seaport Lane
10th Floor
Boston, MA 02210
BY: TROY C. BAILEY, ESQ.
(617) 217-5500 (617) 217-5200 (Fax)
Representing Eckel Industries:
GOVERNO LAW FIRM, LLC
260 Franklin Street
Boston, MA 02110
BY: BRYNA ROSEN MISIURA, ESQ.
(617) 737-9045 (617) 737-9046 (Fax)

1 Representing Combustion Engineering:
2 GOVERNO LAW FIRM, LLC
3 260 Franklin Street
4 Boston, MA 02110
5 BY: JENNIFER A.P. CARSON, ESQ.
6 (617) 737-9045 (617) 737-9046 (Fax)
7
8 Representing Terex, American Crane, and Koehring:
9 GOVERNO LAW FIRM, LLC
10 260 Franklin Street
11 Boston, MA 02110
12 BY: DAVID M. GOVERNO, ESQ.
13 (617) 737-9045 (617) 737-9046 (Fax)
14
15 Representing Eastern Refractories Company:
16 HERMES, NETBURN, O'CONNOR & SPEARING, P.C.
17 111 Devonshire Street, 8th Floor
18 Boston, MA 02109
19 BY: JOHN R. FELICE, ESQ.
20 (617) 728-0050 (617) 728-0052 (Fax)
21
22 Representing Boston Edison:
23 McDONOUGH, HACKING & NEUMEIER, LLP
24 11 Beacon Street, Suite 1000
Boston, MA 02108
BY: CHRISTOPHER W. COSTELLO, ESQ.
(617) 367-0808 (617) 367-8307 (Fax)
Representing Paul E. Dutelle & Company, Inc.:
ANDERSON, ADLER, COHEN & HARVEY
230 Congress Street
Boston, MA 02110
BY: JENNIFER BOYD HERLIHY, ESQ.
(617) 423-6674 (617) 423-7152 (Fax)
Representing Dresser Industries, Inc.:
GIDLEY, SARLI & MARUSAK
One Turk's Head Place, Suite 900
Providence, RI 02903
BY: DENNIS GRIECO, ESQ.
(401) 274-6644 (401) 331-9304 (Fax)

1 Representing Uniroyal, Inc.:
2 NIXON PEABODY, LLP
3 101 Federal Street
4 Boston, MA 02110
5 BY: DENNIS M. DUGGAN, JR., ESQ.
6 (617) 345-1000 (617) 345-1300 (Fax)
7
8 Representing Manitowoc Company, Inc., Manitowoc
9 Cranes, Inc., and Bucyrus International, Inc.:
10 LECOMTE, EMANUELSON, MOTEJUNAS & DOYLE
11 Presidents Place, 1250 Hancock Street
12 Quincy, MA 02169
13 BY: FRANCIS M. LYNCH, ESQ.
14 (617) 328-1900 (617) 328-2030 (Fax)
15
16 Representing Ingersoll-Rand and Link Belt:
17 LECOMTE, EMANUELSON, MOTEJUNAS & DOYLE
18 Presidents Place, 1250 Hancock Street
19 Quincy, MA 02169
20 BY: RICHARD B. KIRBY, ESQ.
21 (617) 328-1900 (617) 328-2030 (Fax)
22
23 Representing Thomas O'Connor Company:
24 BROADHURST, LAKIN & LAKIN
One Elm Square
Andover, MA 01810
BY: KENNETH A. LAKIN, ESQ.
(978) 470-3545 (978) 470-3464 (Fax)
Representing Waldo Brothers:
McCARTER & ENGLISH, LLP
755 Main Street
Hartford, CT 06103
BY: JAMES T. ZOIS, ESQ.
(860) 493-3900 (860) 493-3939 (Fax)

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<p>5</p> <p>VOLUME I PAGES: 1-198 EXHIBITS: 1-9 COMMONWEALTH OF MASSACHUSETTS Middlesex, ss. Superior Court Department</p> <p>6</p>	<p>1 APPEARANCES:</p> <p>2</p> <p>3 Representing the Plaintiffs:</p> <p>4 LAW OFFICE OF MICHAEL C. SHEPARD, P.C. 205 Portland Street Boston, MA 02114 BY: MICHAEL C. SHEPARD, ESQ. (617) 742-1121 (617) 742-5155 (Fax)</p> <p>6</p> <p>7 Representing Riley Stoker Corporation, The Sherwin-Williams Company, Georgia-Pacific, and Quigley:</p> <p>8 CETRULO & CAPONE 2 Seaport Lane 10th Floor Boston, MA 02210 BY: JENNIFER A. CREEDON, ESQ. (617) 217-5500 (617) 217-5200 (Fax)</p> <p>11</p> <p>12 Representing New England Insulation:</p> <p>13 CETRULO & CAPONE 2 Seaport Lane 10th Floor Boston, MA 02210 BY: KATHARINE S. PERRY, ESQ. (617) 217-5500 (617) 217-5200 (Fax)</p> <p>16</p> <p>17 Representing Amchem Products, Inc., Pfizer, and Union Carbide:</p> <p>18 CETRULO & CAPONE 2 Seaport Lane 10th Floor Boston, MA 02210 BY: TROY C. BAILEY, ESQ. (617) 217-5500 (617) 217-5200 (Fax)</p> <p>21</p> <p>22 Representing Eastern Refractories Company:</p> <p>23 HERMES, NETBURN, O'CONNOR & SPEARING, P.C. 111 Devonshire Street, 8th Floor Boston, MA 02109 BY: JOHN FELICE, ESQ. (617) 728-0050 (617) 728-0052 (Fax)</p> <p>24</p>
Page 7	Page 8
<p>1 Representing Waldo Bros., Inc.:</p> <p>2 McCARTER & ENGLISH, LLP 755 Main Street Hartford, CT 06103 BY: JAMES T. ZOIS, ESQ. (860) 493-3900 (860) 493-3939 (Fax)</p> <p>4</p> <p>5 Representing Thomas O'Connor Company:</p> <p>6 BROADHURST, LAKIN & LAKIN One Elm Square Andover, MA 01810 BY: KENNETH LAKIN, ESQ. (978) 470-3545 (978) 470-3464 (Fax)</p> <p>8</p> <p>9 Representing Combustion Engineering:</p> <p>10 GOVERNO LAW FIRM, LLC 260 Franklin Street Boston, MA 02110 BY: JENNIFER A.P. CARSON, ESQ. (617) 737-9045 (617) 737-9046 (Fax)</p> <p>12</p> <p>13 Representing American Standard and Paul E. Dutelle & Company, Inc.:</p> <p>14 ANDERSON, ADLER, COHEN & HARVEY 230 Congress Street Boston, MA 02110 BY: JENNIFER BOYD HERLIHY, ESQ. (617) 423-6674 (617) 423-7152 (Fax)</p> <p>16</p> <p>17 Representing Weil-McLain and Plibrico:</p> <p>18 PIERCE, DAVIS & PERRITANO, LLP Ten Winthrop Square Boston, MA 02110 BY: JOEL F. PIERCE, ESQ. (617) 350-0950 (617) 350-7760 (Fax)</p> <p>20</p> <p>21 Representing Burnham Corporation:</p> <p>22 TUCKER, HEIFETZ & SALTZMAN Three School Street Boston, MA 02018 BY: M. THERESE ROCHE, ESQ. (617) 557-9696 (617) 227-9191 (Fax)</p> <p>23</p> <p>24</p>	<p>1 Representing Ingersoll-Rand, Pecora Corporation, California Products, Kaiser Gypsum Co., Inc., and Kelly Moore Paint Company, Inc.:</p> <p>2 LECOMTE, EMANUELSON & DOYLE Presidents Place 1250 Hancock Street Quincy, MA 02169 BY: RICHARD B. KIRBY, ESQ. (617) 328-1900 (617) 328-2030 (Fax)</p> <p>6</p> <p>7 Representing Duro-Dyne Corporation, Bird, Inc., and Cleaver-Brooks, a division of Aquachem:</p> <p>8 LECOMTE, EMANUELSON & DOYLE Presidents Place 1250 Hancock Street Quincy, MA 02169 BY: FRANCIS M. LYNCH, ESQ. (617) 328-1900 (617) 328-2030 (Fax)</p> <p>11</p> <p>12 Representing H.B. Fuller:</p> <p>13 POSTERNAK, BLANKSTEIN & LUND 100 Charles River Plaza Boston, MA 02114 BY: JOHN EGAN, ESQ. (617) 973-6100 (617) 367-2315 (Fax)</p> <p>15</p> <p>16 Representing Boston Edison:</p> <p>17 McDONOUGH, HACKING & NEUMEIER, LLP 11 Beacon Street, Suite 1000 Boston, MA 02108 BY: CHRISTOPHER W. COSTELLO, ESQ. (617) 367-0808 (617) 367-8307 (Fax)</p> <p>19</p> <p>20 Also Present:</p> <p>21 CETRULO & CAPONE 2 Seaport Lane 10th Floor Boston, MA 02210 BY: TIERNEY CHADWICK JEREMY EVANS KARA DOWAL (617) 217-5500 (617) 217-5200 (Fax)</p> <p>24</p>

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1 MR. SHEPARD: Objection.
2 A. Well, when you say that they typically
3 wore, it would be my opinion that they typically
4 did not wear those types, and if they did, it was
5 usually along the lines of those 3M paper masks,
6 but I haven't run across that many individuals
7 that actually said they wore masks.
8 Q. Have you seen any papers -- strike
9 that.
10 Other than paper masks, are there any
11 other types of respirators that you're familiar
12 with that painters wore in the '70s while they
13 were using simulated ceiling acoustics?
14 MR. SHEPARD: Objection.
15 A. Not that I'm aware of.
16 Q. I'm sorry, I have to go over a few
17 questions.
18 A. That's fine.
19 Q. Have you ever visited any of the work
20 sites that Mr. Belisle testified he worked at?
21 A. Not that I'm aware of. I don't believe
22 so.
23 Q. Have you ever been to L Street Station?
24 A. No.

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1 A. Again, I was in two cases in this
2 state. The City of Boston versus all the
3 asbestos manufacturers, and the State of
4 Massachusetts versus all the asbestos
5 manufacturers, and both of those cases we did
6 bulk sampling and dust sampling.
7 Now, I can't tell you what those
8 results are or where or et cetera, but I have no
9 intention of relying on those, but if I were to
10 pull all those files out from bygone years, there
11 probably would be some of that data in there.
12 Maybe not, I just don't know.
13 Q. With respect to L Street Station, do
14 you know the dimensions of L Street Station?
15 A. I would estimate a couple hundred yards
16 long, looks like 20 stories tall.
17 Q. Do you know what kind of ventilation it
18 has?
19 A. I can't see it from here, so the answer
20 is no.
21 Q. Do you know which portion of L Street
22 Mr. Belisle worked in?
23 A. No, I do not.
24 Q. Would you agree that various asbestos-

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1 Q. Have you ever seen plans of any of the
2 work sites that Mr. Belisle worked at?
3 A. No.
4 Q. What types of buildings did Mr. Belisle
5 work at?
6 A. Schools, commercial, power plants,
7 chemical plants, heavy industry, commercial
8 office type buildings. A wide range of buildings
9 over his years.
10 Q. Have you ever visited a power plant in
11 Massachusetts?
12 A. I have not.
13 Q. Have you ever seen any photographs of
14 the power plants in Massachusetts?
15 A. No.
16 Q. Have you ever done any dust sampling in
17 a power plant?
18 MR. SHEPARD: In Massachusetts or
19 anywhere?
20 MS. CREEDON: Anywhere.
21 A. Possibly.
22 Q. Where did you possibly do that?
23 MR. SHEPARD: Objection. Asked and
24 answered.

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1 containing products cause different releases of
2 fiber?
3 A. Maybe, and that would depend on what
4 you did to them.
5 Q. Are you relying on any studies that
6 attempt to quantify asbestos exposure with
7 respect to painters?
8 A. Well, I guess, yes. I mean, you have
9 published literature of what happens when
10 somebody sands spackling and joint compounds, and
11 certainly as a painter, certainly Mr. Belisle
12 talked about having to sand spackling and joint
13 compounds.
14 Selikoff's work did quantify those
15 studies and those types of activities, and those
16 are very good examples because they're real world
17 studies.
18 Q. Do you remember the title of Selikoff's
19 study?
20 A. I think it's entitled The Sanding of
21 Patching and Joint Compounds, I believe. It was
22 in the Journal of Science, 1974. I don't
23 remember the lead author, but Selikoff was on the
24 tail end.

<p style="text-align: right;">Page 153</p> <p>1 Q. Is that an epidemiological study?</p> <p>2 A. No. Well, hold on. I think there was</p> <p>3 some of that in there, but most of it was actual</p> <p>4 field measurements of individuals using these</p> <p>5 products.</p> <p>6 Q. Are you relying on any epidemiological</p> <p>7 studies in the Belisle case?</p> <p>8 A. No, that's not my area.</p> <p>9 Q. The last time you testified in</p> <p>10 Massachusetts you testified that you were not an</p> <p>11 industrial hygienist. Is that true today?</p> <p>12 A. I don't believe I've ever said that.</p> <p>13 Q. You are not -- you don't have a degree</p> <p>14 in industrial hygiene; is that accurate?</p> <p>15 A. I do not have a degree in industrial</p> <p>16 hygiene, and I am not a certified industrial</p> <p>17 hygienist.</p> <p>18 Q. Have you ever reviewed any materials</p> <p>19 regarding a product called Bloc-tex?</p> <p>20 A. I know that product.</p> <p>21 Q. What is that product?</p> <p>22 A. As I recall, it's a sealer for</p> <p>23 concrete, concrete blocks, concrete walls. It's</p> <p>24 a paint-type material that does have asbestos in</p>	<p style="text-align: right;">Page 154</p> <p>1 it.</p> <p>2 Q. Who makes it?</p> <p>3 A. I think your client does, or used to.</p> <p>4 Q. Do you know how much asbestos it</p> <p>5 contains?</p> <p>6 A. That I can't recall.</p> <p>7 Q. Have you ever tested that product?</p> <p>8 A. I have not.</p> <p>9 Q. Have you ever seen any studies of</p> <p>10 anyone else testing that product?</p> <p>11 A. No, I have not.</p> <p>12 Q. You'll agree that your demonstrations</p> <p>13 do not replicate the workplace?</p> <p>14 A. I agree.</p> <p>15 MS. CREEDON: That's all the questions</p> <p>16 I have for you today.</p> <p>17 THE WITNESS: Thank you.</p> <p>18 *****</p> <p>19 EXAMINATION BY MR. GOVERNO:</p> <p>20 Q. My name is David Governo. I represent</p> <p>21 Terex, American Crane, and Koehring.</p> <p>22 You talked about a 1995, 1996 Report to</p> <p>23 Congress on secondary exposures?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 155</p> <p>1 Q. And you said that included a good</p> <p>2 review of literature on secondary exposures,</p> <p>3 including secondary exposure to asbestos?</p> <p>4 A. Yes, sir.</p> <p>5 Q. When was the first piece of literature</p> <p>6 cited in that actually published?</p> <p>7 A. 1961 or 2.</p> <p>8 Q. Are you familiar with the asbestos</p> <p>9 content of cosmetics?</p> <p>10 A. In my field I have -- it's sort of like</p> <p>11 an urban legend about the talcs in cosmetics</p> <p>12 containing tremolite. I've never been able to</p> <p>13 verify that.</p> <p>14 * Q. Have you looked for studies reporting</p> <p>15 on asbestos contamination of talc and other</p> <p>16 ingredients of cosmetics?</p> <p>17 A. Well, I'm certainly very familiar with</p> <p>18 the asbestos contamination of talc, but what</p> <p>19 we've seen -- now, I have seen inference to it</p> <p>20 and I have seen studies on talc, and we have done</p> <p>21 our own studies on talc, but what I haven't been</p> <p>22 able to do is find a cosmetic where I can say,</p> <p>23 yes, that has asbestos in it. Tremolite.</p> <p>24 MR. GOVERNO: Can you read my question</p>	<p style="text-align: right;">Page 156</p> <p>1 back, please.</p> <p>2 (* Question read back)</p> <p>3 A. I have looked for all studies on</p> <p>4 contamination of talc involving tremolite. I</p> <p>5 have not seen one with cosmetics.</p> <p>6 MR. GOVERNO: No further questions.</p> <p>7 *****</p> <p>8 EXAMINATION BY MR. GRIECO:</p> <p>9 Q. My name is Dennis Grieco. I have a few</p> <p>10 questions for you. I'll be brief. I have just a</p> <p>11 couple of fill-in questions.</p> <p>12 A. Sure.</p> <p>13 Q. We talked about studies and videos and</p> <p>14 I think I have an idea of where the two shall</p> <p>15 meet, so to speak, but let me see if I can go</p> <p>16 over it with you.</p> <p>17 First, you recall that you were deposed</p> <p>18 here in Massachusetts in that Ondik case in</p> <p>19 January of 2001?</p> <p>20 A. I recall I was here.</p> <p>21 Q. Okay. I'm going to represent to you</p> <p>22 that it was in January of 2001.</p> <p>23 A. I have no reason to dispute that.</p> <p>24 Q. What specific studies have you or your</p>

<p style="text-align: right;">Page 157</p> <p>1 firm performed since that date?</p> <p>2 A. Since January of 2001, as I mentioned</p> <p>3 earlier, we have done additional friction studies</p> <p>4 pertaining to arc grinding of brake shoes. I</p> <p>5 believe we have done a friction study on sanding</p> <p>6 of brake shoes since that time. We have done</p> <p>7 gasket studies in May, a fairly big study, Gasket</p> <p>8 Studies IV and V.</p> <p>9 We have done -- oh, we have done a</p> <p>10 transite study, cutting transite panel. I left</p> <p>11 that one out earlier. I forgot about that one.</p> <p>12 We cut transite panels with a skill saw with a</p> <p>13 carbide blade. I know there's a couple others,</p> <p>14 but I apologize.</p> <p>15 Q. Of those that you just listed for me,</p> <p>16 and any others that you recall in answering this</p> <p>17 next question, which do you intend to or are you</p> <p>18 relying upon with respect to your testimony in</p> <p>19 the Starkweather case?</p> <p>20 A. There are no studies that were done</p> <p>21 after 2001, that I'm aware of, that I would be --</p> <p>22 excuse me, after January of 2001 that I would be</p> <p>23 relying on here.</p> <p>24 Q. Just so I can make sure I understand,</p>	<p style="text-align: right;">Page 158</p> <p>1 Doctor --</p> <p>2 A. Yes, sir.</p> <p>3 Q. -- focussing again on the studies that</p> <p>4 you will rely upon in the Starkweather case,</p> <p>5 those include the specific studies that were</p> <p>6 performed by others that you described for us</p> <p>7 concerning thermal insulation, correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Your own studies performed by you or</p> <p>10 your company with respect to thermal insulation?</p> <p>11 A. That's correct.</p> <p>12 Q. With respect to insulation materials,</p> <p>13 other than thermal insulation in the Starkweather</p> <p>14 case, you intend to rely upon literature produced</p> <p>15 by Peter Harries in the mid '60s; is that right?</p> <p>16 A. That's one of the studies.</p> <p>17 Q. What are the others?</p> <p>18 A. Oh, on insulating cements?</p> <p>19 Q. Yes.</p> <p>20 A. I don't know of another one besides</p> <p>21 his.</p> <p>22 Q. And you also intend to rely upon your</p> <p>23 Secondary Exposure Studies II and III in the</p> <p>24 Starkweather case, correct?</p>
<p style="text-align: right;">Page 159</p> <p>1 A. That's correct.</p> <p>2 Q. And there are videos to those two</p> <p>3 studies?</p> <p>4 A. That's correct.</p> <p>5 Q. And there's also a video related to the</p> <p>6 thermal insulation study that you just mentioned,</p> <p>7 correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And that is the full gamut of studies,</p> <p>10 literature, and/or videos that you intend to rely</p> <p>11 upon in the Starkweather case?</p> <p>12 A. Oh, no. Maybe I wasn't asked, but</p> <p>13 certainly I have a library of secondary exposure</p> <p>14 studies. As I was talking about earlier, the</p> <p>15 Report to Congress. If you want to look for one</p> <p>16 document that really is a good compilation of all</p> <p>17 the studies, that's a good one, the '95 Report to</p> <p>18 Congress.</p> <p>19 Q. Okay. Outside of that '95 Report to</p> <p>20 Congress and the studies and videos you just</p> <p>21 described for me, are there any other studies or</p> <p>22 literature that you intend to rely upon or are</p> <p>23 relying upon for your opinions in the</p> <p>24 Starkweather case?</p>	<p style="text-align: right;">Page 160</p> <p>1 A. Just to be clear, I think the answer is</p> <p>2 no, but to make sure of that, the references in</p> <p>3 that Report to Congress are all references that I</p> <p>4 have, but other than that, no, that's it.</p> <p>5 Q. And we've described all the videos or</p> <p>6 other graphic presentations that you intend to</p> <p>7 rely upon in the Starkweather case?</p> <p>8 A. Based on the information I have now,</p> <p>9 yes.</p> <p>10 Q. Okay. Now, turning specifically to</p> <p>11 your understanding of Mr. Byrnes' exposure, Mrs.</p> <p>12 Starkweather's father, am I correct in</p> <p>13 understanding that, as you sit here today, you</p> <p>14 don't know which, if any, work site his asbestos</p> <p>15 exposure took place at, but you know it was with</p> <p>16 respect to this dust cloud from ripping down the</p> <p>17 boiler that Mr. Riley mentioned; is that correct?</p> <p>18 MR. SHEPARD: Objection.</p> <p>19 MR. COSTELLO: Objection.</p> <p>20 A. No, not quite correct. I said that was</p> <p>21 probably one of the larger exposures, but it is</p> <p>22 my opinion that any time during that time frame</p> <p>23 working at any powerhouse you're going to have</p> <p>24 some exposure, even if you're outside, just</p>

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1 nor rejected.

2 Q. Okay. That's even a finer line than

3 the one I thought you were drawing. Okay.

4 What can you tell me, if anything,

5 about your friction studies and whether they've

6 been --

7 A. Same thing.

8 Q. Exact same answer?

9 A. Yes, sir.

10 Q. Okay.

11 MR. LYNCH: That's all I have. Anybody

12 else?

13 THE WITNESS: And I apologize, because

14 I understand, but after my last go-around with my

15 recent paper and what happened and all the behind

16 the scenes to try to stop it, I'm really more

17 sensitive now than I've ever been about that sort

18 of stuff.

19 MR. KIRBY: We can certainly appreciate

20 that.

21 MR. LYNCH: Does anybody have any more

22 questions? Okay. Does anybody have anything

23 else they want to put on the record?

24 MS. ROCHE: Am I correct that we're

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1 suspending pending the receipt of the documents
2 we've specified?

3 MR. SHEPARD: The defendants' position
4 is it's suspended; the plaintiff's position is it
5 is over.

6 MS. ROCHE: I just want to make sure
7 it's on the record.

8 MR. SHEPARD: Yes.

9

10 (Off the record at 3:38 p.m.)

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[illegible]